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International Corporation*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GRANT NAPEAR,

Plaintiff,

v.

BONNEVILLE INTERNATIONAL
CORPORATION, a Utah corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 2:21-cv-01956-KJM-DB

**JOINT STIPULATION AND ORDER
REGARDING STAY OF DEPOSITION
DISCOVERY**

District Judge Kimberly J. Mueller
Magistrate Judge Deborah Barnes

Complaint Filed: October 21, 2021

JOINT STIPULATION

Pursuant to Local Rule 143, Plaintiff Grant Napear and Defendant Bonneville International Corporation (“Bonneville”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on April 6, 2022, the Court reset the Status (Pretrial Scheduling) Conference in this matter for July 28, 2022 (ECF No. 29), in light of Bonneville’s pending Motion to Dismiss First Amended Complaint (“Motion to Dismiss”) (ECF No. 13);

WHEREAS, on April 15, 2022, counsel for Bonneville and counsel for Mr. Napear met and conferred regarding a proposed stay of deposition discovery pending the Court’s decision on the Motion to Dismiss;

WHEREAS, Mr. Napear has noticed depositions of certain party and third-party witnesses;

THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1. The depositions of John Rinehart, Steve Cottingim, and Matina Kolokotronis— noticed by Mr. Napear for April 25, May 2, and May 10 respectively— will go forward as noticed;
2. All other party and third-party depositions will be stayed pending the Court’s ruling on the Motion to Dismiss;
3. Deposition discovery will automatically reopen upon the Court’s ruling on the Motion to Dismiss if the motion is not granted in its entirety;
4. The deposition of Darrell Brown will be preliminarily scheduled for August 11, 2022, and will go forward on that date if the Court has ruled on the Motion to Dismiss by that time.

1 DATED: April 20, 2022.

FOLEY & LARDNER LLP

2 /s/ Tanner B. Camp

3 David J. Jordan

Tanner B. Camp

4 *Attorneys for Defendant Bonneville International*
5 *Corporation*

6 DATED: April 20, 2022.

RUGGLES LAW FIRM

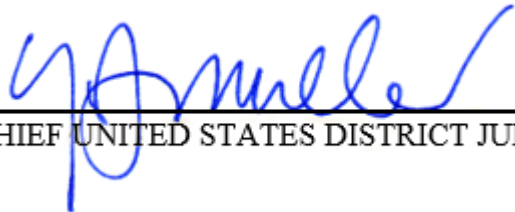
7 /s/ Matthew J. Ruggles (as authorized on 4/20/2022)

8 Matthew J. Ruggles

9 *Attorneys Plaintiff Grant Napear*

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11
12 DATED: April 26, 2022.

13 
14 CHIEF UNITED STATES DISTRICT JUDGE